

R. William Potter  
Peter D. Dickson  
POTTER AND DICKSON  
194 Nassau Street, Suite 31  
Princeton, NJ 08542  
Telephone: (609) 921-9555  
Fax: (609) 921-2181  
Email: [rwppddl@cs.com](mailto:rwppddl@cs.com)  
and [potterrex@cs.com](mailto:potterrex@cs.com)  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

BRRAM, INC., ET AL.,	:	Civil Action No. 3:14-cv-02686 (JAP)
Plaintiffs,	:	
v.	:	Hon. Joel A. Pisano, U.S.D.J.
	:	Hon. Douglas E. Arpert, U.S.M.J.
UNITED STATES FEDERAL	:	
AVIATION ADMINISTRATION,	:	
ET AL.,	:	DOCUMENT FILED
Defendants.	:	ELECTRONICALLY

NOTICE OF MOTION  
FOR LEAVE TO AMEND THE COMPLAINT

To: Paul J. Fishman, United States Attorney  
J. Andrew Ruymann, Assistant U.S. Attorney  
402 East State Street, Room 430  
Trenton, New Jersey 08608  
Attorneys for the United States Federal Aviation Administration  
and

John E. Flaherty  
Ravin R. Patel  
McCarter & English  
Four Gateway Center, 100 Mulberry  
Street  
Newark, NJ 07102  
Attorneys for Frontier Airlines, Inc.

Robert E. Cohn  
Justin A. Savage  
Emily E. Kimball  
Hogan Lovells US LLP  
555 Thirteenth Street, N.W.  
Washington, DC 20004

and

Arthur R. Sypek, Jr.  
Paul R. Adezio  
Joseph P. Blaney  
Mercer County Counsel  
640 McDade Administration Building  
Trenton, NJ 08650  
Attorneys for Mercer County Board of Chosen Freeholders

PLEASE TAKE NOTICE that on December 15, 2014, the undersigned attorney, on behalf of the plaintiffs, BRRAM, Inc., Ms. Holly Bussey, Mr. William Lynch, Mr. Richard DeLello, Ms. Julie Power, Mr. John Giacobetti, Mrs. Jenifer Giacobetti, Ms. Deborah Leamann, Ms. Caroline Bondi, Ms. Delores Brienza, Mr. Richard Wayne, the Board of Supervisors of Township of Lower Makefield, the Board of Supervisors of Upper Makefield Township, and the Borough Council of the Borough of Yardley, will move before the Honorable Joel A. Pisano, United States District Judge, United States District Court, at 402 East State Street, Trenton, New Jersey, for leave to amend the complaint. This motion is brought pursuant to the provisions of Fed. R. Civ. P. 15(a)(2).

In support of this motion, the plaintiffs will rely upon the enclosed

memorandum. The First Amended Complaint is enclosed herewith. A proposed Order is submitted along with this Notice of Motion.

Plaintiffs do not request oral argument.

Respectfully submitted,

/s/ R. William Potter

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Dated: November 20, 2014.

R. WILLIAM POTTER  
Attorney for Plaintiffs